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16  
17 **UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

18 CHANAAZ MANGROE  
19 p/k/a Channii Monroe,

20 Plaintiff,

21 vs.

22 TERIUS GESTEELDE-DIAMANT  
23 p/k/a "THE-DREAM"; CONTRA  
PARIS, LLC; and EPIC RECORDS,

24 Defendants.

Case No. \_\_\_\_\_

**COMPLAINT SEEKING  
DAMAGES**

**JURY TRIAL DEMANDED**

25 **TRIGGER WARNING:**  
26 **THIS DOCUMENT CONTAINS HIGHLY GRAPHIC INFORMATION OF A**  
27 **SEXUAL NATURE, INCLUDING SEXUAL ASSAULT**

28 **COMPLAINT SEEKING DAMAGES**

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1 Plaintiff Chanaaz Mangroe p/k/a Channii Monroe (“Plaintiff” or “Ms.  
2 Mangroe”) hereby alleges, by and through her undersigned counsel, Wigdor LLP  
3 and Girard Bengali, APC, as and for her Complaint against Defendants Terius “The-  
4 Dream” Gesteelde-Diamant (formerly known as Terius Youngdell Nash) (“Dream”);  
5 Contra Paris, LLC (“Contra Paris”); and Epic Records (“Epic”) (together  
6 “Defendants”) as follows:

### 7 PRELIMINARY STATEMENT

8 1. The-Dream is an award-winning singer, songwriter, and producer who  
9 has risen to fame writing and producing songs for the musical stars of the last two  
10 decades. He has been hailed as one of the prolific hit makers in the industry and is  
11 considered innovative and incredibly talented.

12 2. He has fashioned himself as a champion of art and artists, once calling  
13 major record labels “evil” and stating that “artists are treated like slaves” in the  
14 record industry.<sup>1</sup>

15 3. In 2014, Ms. Chanaaz Mangroe was 23 years old, working in the United  
16 States on an international visa from the Netherlands, hoping to land her big break as  
17 a singer and songwriter.

18 4. When associates of Dream reached out to Ms. Mangroe via social  
19 media, she was thrilled—she immediately sent along samples of her work and was  
20 quickly invited to join Dream and his partner Tricky Stewart in Atlanta.

21 5. Far from being the amazing breakthrough opportunity she imagined,  
22 Ms. Mangroe’s experience with Dream was nothing short of a prolonged nightmare.

23 6. Under the guise of pursuing a legitimate recording and publishing  
24 contract with Ms. Mangroe, Dream lured the young and vulnerable artist into an

25 \_\_\_\_\_  
26 <sup>1</sup> <https://www.billboard.com/music/rb-hip-hop/the-dream-artists-are-treated-like-slaves-music-business-contra-paris-6605182/>

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1 abusive, violent, and manipulative relationship filled with physical assaults, violent  
 2 sexual encounters, and horrific psychological manipulation.

3 7. In both Atlanta and Los Angeles, Dream used his age and influence in  
 4 the industry to manipulate the young artist into believing that she needed him to be  
 5 successful, and roped her into his world through false promises to gain Ms.  
 6 Mangroe's complete trust, including:

- 7 • Assuring her that he would sponsor the extension of her international
- 8 visa;
- 9 • Telling her he would write blockbuster songs for her if she became part
- 10 of his so-called "sanctuary," like he did for Beyonce<sup>2</sup> and Rihanna;
- 11 • Offering her lofty visions of recording and publishing contracts with
- 12 major labels, assuring her he would appropriately advocate for her; and
- 13 • Promising her she would open for Beyonce's upcoming tour, going as
- 14 far to force Ms. Mangroe to diet and exercise excessively to prepare for
- 15 the tour.

16 8. In reality, Dream used Ms. Mangroe for his base desires, which  
 17 manifested in violent sexual acts and vicious psychological torture. For example:

- 18 • Dream locked Ms. Mangroe in a dark room adjacent to a recording
- 19 studio, violently having sex with her and then leaving her alone, naked
- 20 in the dark, for hours on end, returning to again have sex with her and
- 21 demand that she tell him she loved him.

22  
 23  
 24 <sup>2</sup> An April 1, 2024 *New Yorker* article emphasizes the close relationship between  
 25 Dream and Beyonce, going so far as to call Dream her "musical soul mate." See  
 26 [https://www.newyorker.com/culture/cultural-comment/can-beyonce-ever-burn-down-the-](https://www.newyorker.com/culture/cultural-comment/can-beyonce-ever-burn-down-the-barn)  
 27 [barn](https://www.newyorker.com/culture/cultural-comment/can-beyonce-ever-burn-down-the-barn). As will be detailed herein, Dream regularly used the success he reached working  
 28 with Beyonce to excuse his violent, coercive, and manipulative behavior.

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- Dream controlled all aspects of Ms. Mangroe's stay in the United States, including providing her housing, transportation, and food expenses. He kept a close track of her location at all times, calling and texting her at all hours to demand updates on her location, or even keeping his own key to Ms. Mangroe's hotel room so that he could enter whenever he pleased with no notice.
- Dream forced Ms. Mangroe to drink excessive amounts of alcohol by roughly pulling her head back by her hair and pouring alcohol down her throat.
- Dream frequently strangled Ms. Mangroe during violent sex, sometimes with his hands, and once using the collar of her dress. On multiple occasions, Dream choked Ms. Mangroe so intensely that she almost lost consciousness.
- Dream refused to wear a condom and regularly ejaculated inside of Ms. Mangroe against her protests. When he discovered she was taking birth control, he became enraged because he believed it to be a sign of disrespect. She was forced to hide her birth control pills under a mattress.
- Dream berated Ms. Mangroe while having sex with her, calling her ungrateful and insisting that she praise him and declare her loyalty to him.
- Dream once raped Ms. Mangroe in the back of a renovated sprinter van, the same evening that he forced her to engage in sex acts in a public movie theater.

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- Dream recorded Ms. Mangroe during sexual acts and used the existence of the recording to threaten Ms. Mangroe into silence.

9. His depraved behavior was facilitated by his record label, Contra Paris LLC, as well as by Epic Records—the label Dream convinced to invest in Ms. Mangroe, despite the fact that he never intended to truly support her career trajectory, but instead wanted corporate funding to assist in his trafficking venture.

10. The result of Dream’s heinous acts was that Ms. Mangroe’s career was upended—her music was taken from her without any explanation, Contra Paris never provided her any compensation, and every attempt to revive her career has been hijacked by Dream and those who support him.

11. Over more than a year, Ms. Mangroe experienced trauma that she has still not recovered from—she is broken as an artist, constantly afraid for her physical safety, and plagued by reminders of the violence and control she experienced at the hands of Dream, who has continued his successful career unscathed by his horrific acts.

12. Nearly a decade later, Ms. Mangroe is still putting the pieces of her life back together, but she knows that without speaking up about what Dream did to her, she will never be able to heal from the harm he has caused.

13. She therefore brings this lawsuit to speak up for herself and other female artists who have been tormented by powerful and selfish men in the recording industry. She seeks justice and accountability to prevent further horrific abuse like she experienced, and to regain her sense of self as an artist and as a woman.

### JURISDICTION AND VENUE

14. This Court has jurisdiction pursuant to 28 U.S.C. §§ 1331 and 1343, as this action asserts violations of 18 U.S.C. § 1591, *et seq.*, and therefore raises federal questions regarding the deprivation of Plaintiff’s rights. The Court has supplemental

jurisdiction over Plaintiff's related claims arising under state law pursuant to 28 U.S.C. § 1367(a).

15. Pursuant to 28 U.S.C. § 1391(b), venue is proper in this Court because a substantial part of the events or omissions giving rise to this action, including the intentional and negligent tortious conduct alleged herein, occurred in this District.

## PARTIES

16. Plaintiff Chanaaz Mangroe is a 33-year-old woman and is domiciled in the Netherlands.

17. Defendant Terius "Dream" Gesteelde-Diamant is, upon information and belief, domiciled in Atlanta, Georgia.

18. Defendant Contra Paris, LLC is a limited liability company incorporated in Delaware that executed a recording and shopping agreement with Plaintiff that was, upon information and belief, owned and operated by Dream and his partner Christopher "Tricky" Stewart during the relevant time period.

19. Defendant Epic Records is a record label owned by Sony Music Entertainment that is headquartered in California.

## FACTUAL ALLEGATIONS

### **I. The Dream Has Established Himself as a Talented and Powerful Songwriter and Producer and as a Violent Misogynist**

20. Dream is a Grammy Award-winning singer, songwriter, and producer known for authoring some of the most famous modern songs, including Rihanna's "Umbrella," Justin Bieber's "Baby," Mariah Carey's "Touch My Body," and Kanye West's "All of the Lights."

21. He is also known as a go-to producer and songwriter for Beyonce, penning her hit songs, "Single Ladies (Put a Ring on It)," "Run the World (Girls),"

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1 “Partition,” and is listed in the credits on every album of Beyonce’s since 2008,  
 2 including Beyonce’s most recent *Cowboy Carter*.

3 22. His accomplishments earned him eight Grammy Awards and a  
 4 nomination for the newly created category of Songwriter of the Year at the 65th  
 5 Grammy Awards.

6 23. Dream also recorded and released his own music on various other  
 7 labels, including Def Jam Recordings and Capitol Records.

8 24. Dream is also well-connected in the business side of the music industry,  
 9 being named Executive Vice President of A&R at Def Jam Records in 2012, where  
 10 he signed and produced new artists to the label.

11 25. In 2014, Dream launched his own record label called Contra Paris. He  
 12 incorporated the label as a limited liability company, Contra Paris LLC, in Delaware  
 13 in December 2014.

14 26. According to Dream, Contra Paris was a “designer and culture label”  
 15 or an “art label,” founded along with Jay Z. As he said in one interview: “It’s about  
 16 art overall, period. Anything that’s art, we’re trying to get into. I have a lot of people  
 17 hitting me on Instagram, guys and girls, that are trying to fuse music with their  
 18 culture. Whatever that culture is, as long as it’s art.”<sup>3</sup>

19 27. It is not clear if Contra Paris ever signed any artists to its label (aside  
 20 from Ms. Mangroe), or whether any records were released by the label. Today, the  
 21 Contra Paris website appears partially defunct, and seems to function as a  
 22 consignment shop for a handful of items of clothing that presumably belong to  
 23 Dream.

24  
 25  
 26 <sup>3</sup> <https://hypebeast.com/2015/4/the-dream-and-jay-z-are-starting-an-art-label-together>



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28. Dream has regularly maintained that he has a “soft spot” for women. In an interview with *New York Magazine*, he was commended for his songs celebrating “tough cookie feminism,” and was quoted as saying “I’ve always had a soft spot for women because of my mom. Just their power. Man’s biggest enemy is a woman who has it in for them. I just like being around them, watching, soaking up the information, being cursed out, being put out.”<sup>4</sup> Another publication noted that Dream “has mostly cast himself as a worshipper of women, a put-them-on-a-pedestal type – not usually a healthy attitude, but in the R&B landscape he has stood out as a romantic.”<sup>5</sup>

29. Yet this feminist persona is plainly contradicted by the reality of Dream’s relationships with women and his highly-publicized arrests for domestic violence.

30. Dream has been married multiple times and has fathered nine children with four women.

31. In 2010, while married to singer Christina Milian, pictures of Dream and his assistant having an affair in the Caribbean leaked online. Dream then filed for divorce from his then-wife—all of nine days before Milian gave birth to the couple’s daughter. Later news stories reported that Milian’s divorce settlement was contingent on Milian’s agreement to never speak about their marriage.<sup>6</sup>

32. His chauvinism was further on display when asked about his role as a parent to his daughter. In an interview with *Essence Magazine*, when asked if he helped Milian with the baby, he said the following: “I don’t [help Milian out] because my ‘helping out’ turns into expectations. I’ll get Violet on a late night maybe one or

<sup>4</sup> <https://nymag.com/arts/popmusic/features/66998/>

<sup>5</sup> <https://www.theguardian.com/music/2011/sep/08/the-dream-terius-nash-1977>

<sup>6</sup> <https://www.essence.com/news/christina-milian-dream-4-million-divorce-settlement/>



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1 two times, but after that, no. If Christina's tired, call the nanny, call Violet's granny.  
2 We got people."

3 33. In 2013, he shared that he was writing a book about relationships,  
4 despite his multiple divorces, and was quoted saying, "But why get married? What  
5 do they say? 'Get the milk without the cow.'"<sup>7</sup> Such a statement crudely refers to  
6 women as cattle and further suggests that Dream does not think romantic  
7 commitment is worthwhile if sex (i.e., "the milk") could be achieved without the  
8 commitment.

9 34. That same year, a mere month after making the statement quoted above,  
10 Dream was arrested in California for a domestic violence incident with his girlfriend  
11 at the time, who declined to press charges.

12 35. Less than a year later, however, Dream was again arrested on charges  
13 of felony assault and strangulation, reckless endangerment, and child endangerment  
14 of his girlfriend, who was pregnant at the time. The criminal complaint alleged that  
15 Dream pulled and dragged his ex-girlfriend by her hair, choked her with a necklace  
16 she was wearing, kicked her, punched her in the head, and grabbed her by the neck,  
17 choking her again. His ex-girlfriend took photographs of the bruises Dream left of  
18 her—those pictures, showing bruises on her arm and scratches on her neck and  
19 wrists, were publicly released by TMZ.

20 36. Outrageously, Dream publicly insisted that his ex-girlfriend pressed  
21 charges to protect her immigration status.

22 37. And ironically, Dream has been quoted in *Rolling Stone* as stating that  
23 no one "takes the time to understand a man" or the psychological impacts on men  
24 "with men not being able to work as much as they did when I was small. It's not  
25

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26 <sup>7</sup> <https://www.bet.com/article/7z2ah9/the-dream-to-pen-relationship-book>

1 about equal or not.”<sup>8</sup> He went on to ask, “[w]hoever thought that the weakest part  
2 of life would be masculinity?”

3 38. When Plaintiff was first connected to Dream, she only knew of his  
4 reputation as a famous and accomplished songwriter and had not heard about his  
5 history of violence towards women. Those around Dream, however, and the  
6 businesses that supported his artistic endeavors, were aware of the violent  
7 misogynist that successful hid his true self behind his songs of female empowerment.

8 **II. Ms. Mangroe is an Extraordinary Singer and Songwriter and**  
9 **Receives an O-1B Visa for Her Abilities in the Arts**

10 39. Ms. Mangroe was raised in the Netherlands with a passion, love, and  
11 extraordinary talent for writing and recording music. As a teenager, she began  
12 posting her songs on social media, developing a devoted following and catching the  
13 attention of several well-known producers around the world.

14 40. In 2012, when Ms. Mangroe was just 21 years old, she signed a  
15 production deal with U.S.-based production company Shapiro, Bernstein & Co., Inc.  
16 as a songwriter. As a result, she applied for a three-year O-1B visa for an “alien of  
17 extraordinary ability in the arts or extraordinary achievement in the motion picture  
18 or television industry.”

19 41. As the then-President of Shapiro, Bernstein & Co., Inc. wrote in support  
20 of Ms. Mangroe’s O1-B visa application, “Channii is an extraordinary artist who has  
21 established herself as one of the top Singer/Songwriters in Europe. At only 21 years  
22 old, Channii is on the short list of the music industry’s most coveted artists, achieving  
23 outstanding success in a relatively short period of time. She is sought after by the  
24

25 <sup>8</sup> [https://www.rollingstone.com/music/music-features/the-dream-talks-love-after-](https://www.rollingstone.com/music/music-features/the-dream-talks-love-after-lemonade-why-he-deserves-legendary-status-106465/)  
26 [lemonade-why-he-deserves-legendary-status-106465/](https://www.rollingstone.com/music/music-features/the-dream-talks-love-after-lemonade-why-he-deserves-legendary-status-106465/).

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1 top recording artists, record labels, producers, and insiders in the business and her  
2 collaborations read like a who's who in the music industry."

3 42. In further support of Ms. Mangroe's application for an O-1B visa, the  
4 Vice President of Membership for the American Society of Composers, Authors, and  
5 Publishers wrote: "Channii is an extraordinarily talented artist. In her native Holland  
6 she has earned a reputation as one of Europe's most compelling and creative  
7 singer/songwriters...[i]t's not often that a foreign songwriter like Channii makes  
8 such an impact this side of the Atlantic. It's a testament to her spectacular talent and  
9 ability that at the tender age of 21 she is on the short list of the music industry's most  
10 coveted artists."

11 43. Not surprisingly, Ms. Mangroe was awarded a three-year O-1B visa and  
12 began frequently working in the United States throughout 2012-2015 as a songwriter  
13 for Shapiro, Bernstein & Co., Inc.

14 44. Throughout this time, Ms. Mangroe continued to post her work on  
15 social media, including Instagram, which is how she was ultimately connected with  
16 Dream.

17 **III. Dream and His Team Make False Promises to Lure Ms. Mangroe to**  
18 **Atlanta**

19 45. In late 2014, Ms. Mangroe was considering her options once her O-1B  
20 visa expired by 2015. She knew that she wanted to focus on her own recording  
21 career and, as a result, was speaking to several well-known producers about potential  
22 next steps and sponsorship of her visa renewal.

23 46. It was around that same time in late 2014 that Dream's childhood friend  
24 and personal security detail, Chris Garland ("Garland"), reached out to Ms. Mangroe  
25  
26

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1 via Instagram and asked her to send him music to share with Dream's manager,  
2 Merck Mercuriadis ("Merck").<sup>9</sup>

3 47. At the time, Dream and his creative partner, Christopher "Tricky"  
4 Stewart ("Tricky") had reached enormous success, including producing and/or  
5 songwriting for Beyonce, Rihanna, Britney Spears, Mariah Carey, and Justin Bieber,  
6 producing five of his own studio albums, and receiving several Grammy Award  
7 nominations and multiple wins.

8 48. As a successful performer, songwriter, and producer, Dream seemed  
9 like the perfect fit for Ms. Mangroe, who was enormously talented in both  
10 performing and songwriting. Ms. Mangroe was thrilled at the opportunity to get her  
11 music in front of Dream and have the chance to work with someone who had  
12 significant connections and influence in the music industry. She therefore  
13 immediately sent Garland some of her music.

14 49. Garland quickly responded that he would arrange a meeting between  
15 Ms. Mangroe and Merck. Ms. Mangroe happily said that she would meet with  
16 Dream and/or his team.

17 50. In January 2015, while Ms. Mangroe was already in Los Angeles,  
18 Merck reached out to Ms. Mangroe to arrange for her to fly to Atlanta to meet Dream.  
19  
20  
21

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22 <sup>9</sup> Although Garland told Ms. Mangroe that Merck was Dream's manager, she later  
23 learned that Mark Stewart ("Mark"), Tricky Stewart's brother, was in fact Dream's  
24 manager. The exact relationship between Dream and Merck at that time is unclear, but this  
25 misrepresentation was just one of many upon which Ms. Mangroe relied. However, he did  
26 assist in arranging the initial meeting between Ms. Mangroe and Dream and, in 2018, it  
27 was reported that the company that Merck founded, Hipgnosis, acquired the catalogs of  
28 both Dream and Tricky Stewart. *See, e.g.,* <https://www.billboard.com/pro/hipgnosis-tricky-stewart-songwriting-catalog/>.

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1           51. She arrived in Atlanta on January 29, 2015, where Garland picked her  
2 up at the airport and told her that she would be meeting Dream at a club that evening  
3 because Dream wanted to observe how she “handled herself” in a club atmosphere.

4           52. Several hours later, Ms. Mangroe met Dream, Tricky, and Garland in  
5 front of Gold Room Club. Ms. Mangroe did not have any significant interaction  
6 with Dream while they were in the club, but she was told to get into Dream’s car  
7 with him and Garland at the end of the night. While they drove Ms. Mangroe back  
8 to her hotel, Dream discussed taking her to a basketball game the following day.  
9 When Ms. Mangroe attempted to turn the conversation to getting into the studio to  
10 record, Dream confirmed she would have the chance to record during the trip.

11           53. The next day, on January 30, 2015, Ms. Mangroe went into a studio to  
12 record with Dream’s sound engineer, Bart Schoudel (“Schoudel”).

13           54. During the recording session, Ms. Mangroe recorded a verse for the  
14 song Transparent, which was supposed to be part of Dream’s forthcoming two-part  
15 EP, Crown Jewel. While the official release of Crown Jewel was delayed, the song  
16 eventually leaked online. Dream failed to give any credit (or compensation) to Ms.  
17 Mangroe for her vocals.

18           55. On the following day, January 31, Ms. Mangroe went back to the studio  
19 and recorded the song “187,” which Dream had written. Although Ms. Mangroe had  
20 no gang affiliations or violent history, she was presented with a song titled with the  
21 slang used for “murder.”

22           56. That evening Dream arranged for Ms. Mangroe to attend an Atlanta  
23 Hawks basketball game with Schoudel, providing her with courtside seats. After the  
24 game, Dream and several others, including Tricky and Garland, took Ms. Mangroe  
25 to a strip club. At that point, Ms. Mangroe had not yet “earned” the right to have  
26 Dream’s phone number, so arrangements were made through Garland.

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1           57. Ms. Mangroe had never been to a strip club before. While there, Dream  
2 repeatedly handed Ms. Mangroe large stacks of cash and demanded that she throw  
3 the money at the strippers.

4           58. At one point, one of the strippers came to their table completely naked  
5 and Dream instructed the stripper to get on top of Ms. Mangroe. Ms. Mangroe was  
6 visibly uncomfortable with the situation.

7           59. Dream seemed to enjoy how uncomfortable Ms. Mangroe became. He  
8 laughed as Ms. Mangroe asked the stripper to leave and perform for Dream instead.  
9 Dream insisted that the stripper go back over to Ms. Mangroe several times  
10 throughout the evening.

11           60. The following day, on February 1, 2015, Dream texted Ms. Mangroe  
12 for the first time—an apparent sign that she passed the “tests” that Dream had been  
13 giving her.

14           61. After saying hello, the first thing Dream texted Ms. Mangroe was “Do  
15 you have a boyfriend, boyfriends aren’t allowed. It’s a distraction.” Ms. Mangroe  
16 was surprised to be asked such a personal question so early on in her  
17 communications with Dream, but she wanted to be cooperative and responded in the  
18 negative.

19           62. As the end of her planned trip to Atlanta neared, Ms. Mangroe still was  
20 not given a recording contract or any indication that one would be forthcoming, but  
21 she remained optimistic because Dream and his team repeatedly expressed how  
22 impressed they were with her vocals and how much they liked her voice and her  
23 general style.

24           63. Finally, shortly before she was scheduled to leave, Dream told Ms.  
25 Mangroe that he wanted to sign her to his label, Contra Paris, LLC (“Contra”). Ms.  
26 Mangroe was so happy and overwhelmed with gratitude—it truly felt like everything

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1 she had been working for was about to come to fruition. Dream told her that he  
2 would make her the next Beyonce and Rihanna.

3 64. Ms. Mangroe explained in detail to Dream that her O-1 visa was set to  
4 expire in November of that year and that she needed a new petitioner to continue her  
5 visa for the following three years. She reiterated that she needed to know if he was  
6 serious about signing her and supporting her O-1 visa because if not, she would need  
7 to search for another petitioner.

8 65. Dream assured Ms. Mangroe that Contra would be her petitioner and  
9 that she did not need to look for a petitioner to continue her visa. He promised that  
10 she would receive an advance and written contract soon. He then asked if she would  
11 go to Los Angeles with him for the next ten days to continue recording. Ms.  
12 Mangroe agreed.

13 66. Ms. Mangroe, then just 23-years-old and in an entirely new and enticing  
14 world, truly believed that all her dreams were about to come true. Unfortunately,  
15 however, she would soon learn that it was just the start of a long nightmare.

16 **IV. Dream Uses His Success with Beyonce and Rihanna to Manipulate and**  
17 **Exploit Ms. Mangroe**

18 67. From the moment Dream began texting Ms. Mangroe, he began  
19 regaling her with stories about how he helped create Beyonce and Rihanna and  
20 would do the same for her as long as she did everything he told her to do.

21 68. Dream told Ms. Mangroe that in order to write songs for her, he needed  
22 to know everything about her, including everything that embarrassed her, upset her,  
23 angered her, and excited her – every single thought she had.

24 69. Perhaps sensing Ms. Mangroe's hesitation and confusion, Dream said  
25 that was how true songwriters and producers needed to operate in order to write the  
26



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1 right song for each artist. He said Ms. Mangroe needed to “belong” to him so they  
2 could become the next “Bey and Jay,” in reference to Beyonce and Jay-Z.

3 70. Dream knew how much Ms. Mangroe loved and admired Beyonce as  
4 an artist. He regularly used Ms. Mangroe’s admiration for Beyonce as a way to  
5 manipulate Ms. Mangroe, telling her that the only reason he achieved such great  
6 success with Beyonce is because they created a “sanctuary” together, which allowed  
7 him to know Beyonce in a way that others could not and, consequently, he could  
8 write the best songs for her.

9 71. Dream explained that a “sanctuary” was even stronger than a spousal  
10 connection because it was about “art.” Being part of a “sanctuary” with Dream  
11 meant that Ms. Mangroe was required to disclose all of her secrets and thoughts and  
12 become “trust partners” with him. He said that his relationship with Beyonce was  
13 so close that he knew about Beyonce’s pregnancy before her husband, Jay-Z.

14 72. For example, Dream texted Ms. Mangroe,  
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I will need to know  
things u think or  
embarrassed about to  
the furthest extent

I'm going to be your  
better half of this goes  
where I think it's going

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1           73. Dream reminded Ms. Mangroe that she better be “grateful” that he was  
2 working with her because he was putting work on Beyonce’s album on hold, and  
3 that if she wanted to reach the same level of success as Beyonce, she needed to  
4 become as close to or closer to him than Beyonce. He said that meant that Ms.  
5 Mangroe should ask and follow his advice on everything, rely on him to be her main  
6 confidant, and limit her inner circle to only those people he approved of and trusted.

7           74. Dream also told Ms. Mangroe that if she “acted right” he would share  
8 the specific formula he used with Beyonce, and that Ms. Mangroe and Beyonce  
9 would be the only two artists with those industry secrets.

10          75. Dream routinely pointed out that he could make any new artist  
11 successful, but he was choosing Ms. Mangroe so he expected her to “respect him  
12 correctly.”

13          76. Dream frequently pitted Rihanna against Beyonce implying that  
14 Rihanna was fighting for his attention and was frustrated that he was giving it to  
15 Beyonce instead of her. He said that Rihanna was begging him for good records but  
16 because of his special “sanctuary” relationship with Beyonce, he saved them for  
17 Beyonce and that Ms. Mangroe could be part of that as well.

18          77. According to Dream, Rihanna was possessive over him and got angry  
19 when he worked with Beyonce. In an apparent effort to reiterate how grateful Ms.  
20 Mangroe should be for the opportunity to work with him, Dream told her that  
21 Rihanna would frequently send him flowers and other gifts. He reiterated that  
22 Rihanna had to “work” to make him give her hit records and he was choosing to  
23 work with Ms. Mangroe instead.

24          78. In one of their earliest text exchanges, Dream asked Ms. Mangroe when  
25 she lost her virginity, explaining that Rihanna had told him this information about  
26

1 herself, insinuating that artists he worked closely with shared such intimate  
2 information with him.

3 79. Dream led Ms. Mangroe to believe through manipulation and coercion  
4 that if she allowed him to completely control every aspect of her life, they could  
5 create the ultimate “sanctuary” that would surpass anything he accomplished with  
6 Beyonce or Rihanna.

7 80. When Ms. Mangroe questioned the idea of the “sanctuary” or asked  
8 Dream to clarify what he meant, she would receive evasive responses like the  
9 following:

10  
11 I let u know after we win  
12 10 Grammys together

13  
14 Right now u just have to  
15 be free and let me  
16 undress u emotionally do  
17 I can know what's  
18 underneath your heart

19  
20 81. For a new artist, the thought of becoming the next Beyonce or Rihanna  
21 was obviously intoxicating, and Ms. Mangroe was willing to work as hard as  
22 possible to make her recording dreams come true.

1           82. Dream told Ms. Mangroe that he was working on Beyonce's new tour  
2 and that if everything went well, Ms. Mangroe could open for her, but shared this  
3 promise only in the context of his emotional manipulation of her:

4  
5 I think the more freedom  
6 u give me the more  
7 relationships I will be  
8 able to put u through  
9 and in. I am a strait  
10 forward person

11 Things like the Beyoncé  
12 opening isn't a big deal  
13 to get it done , that's my  
14 family

15           83. Ms. Mangroe had no reason to disbelieve what Dream was telling her  
16 at that time. He was successful, had made hit records with Beyonce and Rihanna,  
17 and convinced her that two of the most successful recordings artists were dependent  
18 on him for their success.

19           84. Dream regularly held his age and experience in the industry over Ms.  
20 Mangroe, telling her that she simply did not understand how his methods were  
21 necessary to success, and instilling in her that she should be grateful for his efforts  
22 to help her, placing himself on a pedestal and emphasizing that her success was only  
23 possible thanks to Dream. For example, he stated the following over text:

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It means more to me than u can imagine. My risk should tell you that, in your mind u should know that I am risking something far greater than anyone ever has for and with you.

And it's because I know it's beyond explanation

U can't explain this so don't even try and don't mention it, that's why the government denies things , it isn't because it's not true , it's because I lesser mind wouldn't even understand so why stop the life they have and change what they love about there life, it's actually a unselfish thing to hold in a truth

85. Ms. Mangroe was drawn into a whirlwind of lofty messages like this and was quickly convinced that she needed Dream to make it in the music industry, and therefore was willing to take any and all direction from him. Only now does she see that Dream was using fraud and coercion to manipulate her into believing that she was being brought into a legitimate business arrangement, not a venture to use her for Dream's violent sexual desires.

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**V. Ms. Mangroe Goes to Los Angeles to Record Her Album and Dream Begins a Horrific Pattern of Physical, Sexual, and Psychological Manipulation and Abuse under the Guise of Creating “Art”**

86. On February 4, 2015, Ms. Mangroe arrived in Los Angeles directly from Atlanta. Soon after she arrived, she began receiving messages from Dream that were extremely flirtatious, including asking her if she wanted to lose her virginity “again,” implying that he wanted to have sex with her.

87. That evening, Ms. Mangroe was in the studio (which was in Tricky Stewart’s home) recording music. Dream complained that Ms. Mangroe needed to “loosen up” for the sake of the music and pressured her to drink alcohol and smoke marijuana in excessive quantities. Dream told her that “Rih smokes so much that while she’s smoking one blunt, Jenn and Melissa already rollin’ the next one.” Even though Ms. Mangroe did not enjoy using drugs and alcohol, she felt pressured to meet Dream’s expectations of a hit artist.

88. Throughout the evening while they were in the recording studio, Dream became more aggressive in pressuring Ms. Mangroe to have sex with him. He assured her that sex with him was “part of the process” and he could only write hit songs for her if she agreed to let him know everything about her.

89. In an effort to deter Dream, Ms. Mangroe tried to argue that she did not want to do anything that could complicate making great music. In response, Dream told her that that she agreed to be his “trust partner” and not listening to him and doing what he wanted was a sign of disrespect.

90. Ms. Mangroe, who was alone in the United States and increasingly confused and frightened about the situation she was in, tried to protest again.



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1           91. Dream reiterated to Ms. Mangroe that she was part of something  
2 special, that he let her into his sanctuary because she was so talented, and that she  
3 was part of something bigger than anything she could understand.

4           92. In the studio, Dream began to touch Ms. Mangroe, and she pulled back,  
5 suggesting that it was not a good idea to be flirtatious with others around. Dream  
6 proceeded to take Ms. Mangroe through the house where the studio was located,  
7 eventually bringing her to a pitch-black bedroom.

8           93. Upon arriving in a dark bedroom, Ms. Mangroe had no doubt about  
9 what Dream's intentions were. She told Dream, "I don't know about this," and "I  
10 don't want to ruin this." Dream responded by telling her this was "really important"  
11 and that they did not have "time to waste." He insisted that this "will only make the  
12 records that much better."

13           94. Dream then grabbed Ms. Mangroe's hands and placed them on his  
14 genitals. He then quickly escalated, pushing her down on the bed and inserting his  
15 penis into her.

16           95. Others in the studio began to look for Dream and Ms. Mangroe, causing  
17 Dream to leave the bedroom to go back to the recording studio. When he did so, he  
18 locked the bedroom door with Ms. Mangroe inside, naked, in the dark.

19           96. After some amount of time, Dream returned to the bedroom, and again  
20 had sex with Ms. Mangroe. He did this repeatedly for several hours, leaving Ms.  
21 Mangroe tired and confused. During this ordeal, Dream told her that "this was going  
22 to be great" for Ms. Mangroe, and also demanded that Ms. Mangroe tell Dream that  
23 she loved him—in fact, he would only stop aggressively having sex with her once  
24 she said that she loved him.

25           97. When Dream finally let Ms. Mangroe leave the bedroom, it was around  
26 6 a.m., the sun had risen, and most of the people from the studio had left. Tricky,



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1 however, did see her and Dream leave the bedroom at that hour. She returned to her  
2 hotel confused, but tried to remain grateful and hopeful for what she believed was  
3 her big break.

4 98. Given Dream's pressure and insistence, Ms. Mangroe felt it was useless  
5 to continue protesting. Instead, she tried to convince herself that it was a consensual  
6 sexual interaction. It was easier to believe what Dream was saying than to face the  
7 reality of the situation – that a famous and significantly older music producer was  
8 using his influence and power to make a young woman on her own in a foreign  
9 country have sex with him.

10 99. Dream later texted Ms. Mangroe and acknowledged that he pressured  
11 her into having sex with him. In particular, he texted: “[e]ntering you is like walking  
12 through a door of roses, sure there are thorns but isn’t it beautiful, diamonds can’t  
13 be made without pressure nothing great can.”

14 100. On February 7, 2015, Dream texted Ms. Mangroe, “[w]e are married  
15 through art. And I won’t ever let anyone take advantage of you and will perfect [sic]  
16 you to the end. Like a knight.”

17 101. Unfortunately, it was Dream who Ms. Mangroe needed protection from  
18 and there was no knight willing to help her when she needed it the most.

19 102. Throughout her time in Los Angeles, if Ms. Mangroe and Dream were  
20 in the studio at the same time, he expected her to be available to have sex with him  
21 whenever he demanded it.

22 103. Dream refused to use any protection. While she was in Los Angeles,  
23 Ms. Mangroe became sick with strep throat and was given antibiotics to treat it. She  
24 knew that antibiotics could lessen the effectiveness of birth control and begged  
25 Dream not to ejaculate inside of her. He refused. At one point while they were in  
26 Los Angeles, Ms. Mangroe physically tried to get away from him to avoid him

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1 ejaculating inside of her and Dream held her arms down and ejaculated inside of her  
2 over her protests. This type of violent sex, control, and manipulation became more  
3 and more common as the days passed.

4 104. On or around February 13, 2015, Dream sent Ms. Mangroe sexually  
5 explicit texts, including one that said, “I wanted to fuck Ure bladder so hard that it  
6 made u piss all over me.”

7 105. In between sending those text messages, Dream texted Ms. Mangroe  
8 about the recording deals he was working on for her, including “...we will have  
9 major distribution in about 30 days so u better be ready.” Dream frequently used  
10 this type of manipulation where he intertwined business promises with violent sex.

11 106. On February 14, 2015, Dream texted Ms. Mangroe that she “must care  
12 about what [he] care[s] about” and said “Ure life is now u have way more room but  
13 I will care about those things in ur life like they are my own, Ure mother is my  
14 mother, Ure father Ure brother, Ure friends are mines, your enemies I will inherit as  
15 my enemies!” When Ms. Mangroe said she did not understand, Dream responded  
16 “This is that other shit. Blood in blood out.”

17 107. The following day, Dream left Los Angeles for work obligations and  
18 gave Ms. Mangroe permission to go home to Amsterdam as long as she moved to  
19 Atlanta within four days.

20 108. Ms. Mangroe was in a precarious state at the end of her Los Angeles  
21 trip. From a professional standpoint, Ms. Mangroe felt incredibly excited about the  
22 work she had done and could really see her visions of becoming a recording artist  
23 come true. However, she also felt increasingly confused with and fearful of Dream.  
24 He was volatile and quick to anger if she did not quickly comply with his demands;  
25 yet, in such a short period of time, he also told her that he loved her, would protect  
26 her and cared more about her than anyone else ever would. It was dizzying, which

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1 was precisely Dream's intent in his campaign of psychological and physical  
 2 manipulation.

3 **VI. Dream Convinces Ms. Mangroe to Move to Atlanta Where Dream's**  
 4 **Manipulation and Abuse Escalates**

5 109. In order to convince Ms. Mangroe to move to Atlanta, Dream promised  
 6 that the contract was forthcoming, that he would find her an apartment to live in, and  
 7 that he would pay her expenses in Atlanta until she received her advance. As a result,  
 8 Ms. Mangroe flew to Amsterdam on February 17, 2015 to pack all of her belongings  
 9 and prepared to move to Atlanta.

10 110. On the day before she left Los Angeles for Amsterdam, Dream texted  
 11 Ms. Mangroe "[h]opefully we will have a deal memo in place before u come back"  
 12 to confirm that was the plan.

13 111. On the same day, during a text conversation with Ms. Mangroe, Dream  
 14 texted that "...I will not let anyone disrespect you[;] this [contract] will be fair and  
 15 respectful from my end period and I'm going to pay your adv out of pocket fyi. I  
 16 also other than trick [Stewart] and mark [Stewart] would love to be involved in your  
 17 management process."

18 112. Before Ms. Mangroe could even respond to Dream's promise that her  
 19 contract deal would be fair and respectful, Dream said "I need to see inside that  
 20 pussy tho. As Ure man. NOW. Go in the restroom pull Ure panties to the side and  
 21 take a pic."<sup>10</sup>

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22 <sup>10</sup> It is unlikely a coincidence that "Panties to the Side" is the name of a song written  
 23 and sung by Dream. In an interview with *Essence* Magazine, he said the following about  
 24 that track: "It's about a quickie. When you can't really get into it all the way and you can't  
 25 take the panties all the way off, so you just push them to the side. Sometimes you do it just  
 26 because it's hot. You have no reason not to take your clothes off but you just keep them  
 27 on. Everyone at ESSENCE.com should try it, call your man at work and tell him 'I want  
 28 you to come home and pull my panties to the side!'"

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1 113. Because Ms. Mangroe is also a songwriter, she asked Dream whether  
2 the contract would include a publishing deal as well. In response, Dream said he  
3 would “love to do all of [her] stuff” and that he had “already told big Jon [a/k/a/ Jon  
4 Platt, the then Chairman and CEO of Warner/Chappell Music] once [Ms. Mangroe]  
5 was finished with label, [he] will get with him to get [her] pub deal in place.”

6 114. Dream then told Ms. Mangroe to have her attorney “put in any and all  
7 contracts that...[her] option is always to go with [Dream] if there ever is a departure  
8 of [Dream] and [T]rick working together.” This is what is referred to as a “key man”  
9 clause.

10 115. While Ms. Mangroe was in Amsterdam, Dream texted her incessantly  
11 asking whether she was behaving, where she was, and what she was doing.

12 116. On February 18, 2015, Dream told Ms. Mangroe via text message that  
13 Rihanna had just sent him a sexual text, a not-so-subtle hint to remind Ms. Mangroe  
14 to be grateful for him because Rihanna was allegedly interested in him.

15 117. On February 19, 2015, Dream texted Ms. Mangroe: “You belong to me  
16 now! I’m your mother and father and everything.”

17 118. When Ms. Mangroe arrived in Atlanta on February 21, 2015, Garland  
18 picked her up from the airport with a gun sitting between them in the SUV. He told  
19 Ms. Mangroe that she needed his protection because Atlanta was a “crazy place.”  
20 She discovered later that Garland was often carrying Dream’s guns because Dream  
21 had a pending domestic violence charge and was not permitted to have weapons.<sup>11</sup>

22 119. Ms. Mangroe was put in an isolated Residence Inn, which was not  
23 within walking distance of anything. It did, however, allow Dream to come and go

24 <sup>11</sup> Dream’s ex-girlfriend, Lydia Nam, filed a police report in November 2013 alleging  
25 that Dream strangled and physically assaulted her while she was pregnant in April 2013.  
26 The case was dismissed in March 2015. Presumably, Dream was not permitted to carry  
27 weapons while the case was pending.

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1 as he pleased without detection. Dream had his own key to Ms. Mangroe's room  
2 and reminded her that he could stop by at any time—and he frequently did enter her  
3 hotel room with little or no notice.

4 120. Ms. Mangroe, who could not drive and was relying on Dream for  
5 money for all of her expenses because she had not yet received her contract and  
6 advance, was essentially trapped in the Residence Inn unless Garland took her  
7 somewhere.

8 121. While she occasionally used Uber, Garland reiterated that it was a  
9 safety concern and that Dream expected him to transport her.

10 122. Garland made sure to let Ms. Mangroe know how closely he was  
11 watching her when she took Ubers, as he would ask her why the Uber driver took a  
12 certain route, whether the driver was trying to talk to her, and how much she spoke  
13 to the driver.

14 123. Dream became increasingly controlling after Ms. Mangroe moved to  
15 Atlanta. He told Ms. Mangroe that she needed to check in with him every day, she  
16 needed to be available to him whenever he called, and that she should depend only  
17 on him for anything she needed.

18 124. Ms. Mangroe was no longer allowed to attend events or go to clubs with  
19 Dream. She was expected to stay in her hotel unless she was recording or at the  
20 gym. Garland regularly texted her to ask what she was eating and telling her to go  
21 to the gym while making unannounced visits to “check on her.”

22 125. Dream forced Ms. Mangroe to change her social media handles to  
23 include references to Contra Paris, and regularly demanded that she remove certain  
24 posts from her social media, thereby further isolating her from the outside world.

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1 126. Ms. Mangroe had to beg to go to the studio. She was never given a  
2 schedule. Instead, she was just expected to be prepared to go whenever she was  
3 called.

4 127. When she asked Dream if she could go to the studio, he would chastise  
5 her and call her a brat. He would tell her that she had to stop thinking about only  
6 herself, that he was an important producer who was working with a lot of important  
7 people, and that he did not have time for her “nagging” about getting into the studio.

8 128. It was not at all what Ms. Mangroe expected after being in the studio  
9 non-stop during her first visit to Atlanta and Los Angeles. Everything felt different  
10 once she committed to living in Atlanta and was under Dream’s complete control.

11 129. In between berating Ms. Mangroe, Dream continued coming to her  
12 hotel or meeting her in the studio whenever he wanted to demand sex. He also began  
13 doing “walk throughs” of her hotel room to look through all of Ms. Mangroe’s  
14 belongings, including her medication. He got angry when he discovered that Ms.  
15 Mangroe was taking birth control pills and demanded that she throw them away.  
16 According to Dream, it was a sign of disrespect to try to prevent a pregnancy by him.  
17 Ms. Mangroe, who had no desire to be pregnant at that time, began hiding her birth  
18 control pills under her mattress.

19 130. Not surprisingly, Ms. Mangroe had a pregnancy scare shortly after she  
20 arrived to live in Atlanta. Dream sent Garland to buy a pregnancy test and when it  
21 came back negative, Ms. Mangroe let Dream know via text. He immediately called  
22 Ms. Mangroe and screamed at her for almost an hour because he said it was an insult  
23 to him that she was happy that she was not pregnant.

24 131. In the very early morning of February 25, 2015, while at Triangle  
25 Sounds Studio, Dream plied Ms. Mangroe with alcohol and marijuana and forced  
26

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1 her to have sex with him while he recorded it. Ms. Mangroe, who was highly  
2 intoxicated, tried to stop Dream from recording, but he refused.

3 132. The next day, Garland told Ms. Mangroe that for a skinny girl, she had  
4 nice curvy thighs. It was the first time Garland had ever made a comment about her  
5 body. While she had no way of knowing whether that was a coincidence, it certainly  
6 seemed designed to send a message that Dream shared the unconsented-to sex tape.  
7 She was humiliated.

8 133. Dream would later regularly use the recording to threaten Ms. Mangroe  
9 that he could share it with anyone he wanted.

10 134. Dream insisted that Ms. Mangroe tell him that she loved him. She  
11 regularly had to send him text messages expressing how grateful and thankful she  
12 was for him in order to avoid being screamed at for being a brat. She was also  
13 expected to regularly buy him flowers to express her gratitude.

14 135. Dream began having Garland call Ms. Mangroe at all hours of the day  
15 or night to ensure she was in her hotel room. If Ms. Mangroe was sleeping or  
16 unavailable for any reason, Dream would get infuriated.

17 136. Dream and Garland also began monitoring the food that Ms. Mangroe  
18 ate and how often she worked out because Dream thought she had gotten too thin  
19 and wanted her to be curvier, specifically suggesting that she should change her body  
20 in anticipation of the Beyonce tour that she would be able to open for. Ms. Mangroe  
21 was often very hungry because Garland monitored what ate. If she mentioned  
22 something she ate, Dream would tell her that she would need to work out extra hard  
23 the next day.

24 137. Ms. Mangroe considered Garland to be something of a confidant when  
25 she first arrived in Atlanta. He often asked how she was doing and was initially very  
26 kind to her.



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1           138. However, if she complained that she had not been to the studio for a  
2 few days or that she was stuck in her hotel room for several days in a row, Garland  
3 would tell her that all she needed to worry about was keeping Dream happy. As he  
4 explained in sum and substance, “if Dream says something is vanilla, even if you  
5 see and know it’s chocolate, if Dream tells you it’s vanilla, it’s vanilla.”

6           139. Garland casually made statements that he would kill anyone who had  
7 an issue with Dream. Given that he regularly displayed his gun, Ms. Mangroe took  
8 his statement as a veiled threat.

9           140. Ms. Mangroe continued to ask when she would be allowed back in the  
10 studio to record, but Dream continued to push it off. She also asked if she could  
11 start writing songs given that Dream said her deal would include a  
12 publishing/songwriting component, but she was not permitted to write anything.  
13 Dream considered it an insult that she asked, and accused her of insulting his  
14 songwriting.

15           141. Ms. Mangroe continued asking about her contract. On February 28,  
16 2015, Dream said that her contract would be finished soon and again ordered Ms.  
17 Mangroe to ensure that her attorney inserted a “key man” clause into her contract  
18 with Contra Paris (the “Contra Contract”). As Dream wrote in an email to Ms.  
19 Mangroe, “Basically no matter terms or partners, ultimately you choose to exit  
20 binding participants in contract other than Terius Nash [a/k/a/ Dream]. If [D]ream  
21 goes you go. Still remaining bonded to Terius the-dream Nash<sup>12</sup> for remaining term  
22 of contract if any.”

23  
24  
25  
26 <sup>12</sup> Upon information and belief, Dream legally changed his name from Terius Nash to  
Terius Gesteelde-Diamant in or around 2020.

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1           142. With little to no autonomy or freedom, Ms. Mangroe continued to tell  
2 Dream what he wanted to hear—that she was loyal to him, that she wanted the key  
3 man clause, and that she loved him.

4           143. During the second week of March 2015, after a few weeks in the  
5 Residence Inn, Ms. Mangroe discovered bedbugs in her room and asked Garland to  
6 place her in a new hotel.

7           144. For reasons known only to Dream, Ms. Mangroe's request infuriated  
8 him. He screamed that she was trying to take advantage of him, that she was not  
9 loyal and that she was a brat. Ms. Mangroe tried desperately to explain herself, but  
10 Dream's anger continued to escalate. He told her that it was her fault that Beyonce's  
11 album was delayed, and he had the right to tell her what to do to him sexually to  
12 make it up to him. He demanded that Ms. Mangroe apologize to him for the delays  
13 to Beyonce's album while he forced her to perform sexually by commanding oral  
14 sex. Dream roughly shoved his penis inside Ms. Mangroe's mouth until she was  
15 choking. When she attempted to signal with her hands that she was choking, he said  
16 that he was her boss and continued forcing himself inside of her. Eventually, Dream  
17 began to choke Ms. Mangroe with both hands. As she began to pass out, Dream  
18 continued to scream that she was taking advantage of him.

19           145. Dream stormed out and left Ms. Mangroe in shock and with several  
20 bruises on her neck. Fortunately, she knew that Dream was leaving town shortly so  
21 she would have a few days to recover. Dream never apologized or mentioned the  
22 strangling incident again, and unfortunately it would not be the last time he became  
23 physically abusive with Ms. Mangroe.

24           146. On or around March 14, 2015, Dream left Atlanta to handle work  
25 obligations elsewhere. Ms. Mangroe wished him a safe flight before he took off but  
26

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1 when she did not text him the following day, Dream texted her: “U know damn well  
2 u need to check in.”

3 147. During the next few days, Ms. Mangroe made sure to say hello or good  
4 morning. When she missed one day on or around March 21, 2015, Dream texted  
5 her: “Ure not checking in.” Ms. Mangroe responded that she had checked in with  
6 Garland every day, as she was required to do.

7 148. On the following day, Dream texted Ms. Mangroe to say: “My  
8 international wife. I think it’s time for me to hit that pussy. When are you having  
9 my baby. 2023.” When Ms. Mangroe did not immediately respond, Dream texted,  
10 “Ure ignoring me now.”

11 149. Ms. Mangroe immediately responded in fear: “No I’m not ignoring  
12 you! I’m studying.” Dream then threatened Ms. Mangroe that he was going to drive  
13 over to where she was and said he was “on the way” even though Ms. Mangroe later  
14 learned he was not even in the state at that time.

15 150. When Ms. Mangroe did not respond quickly enough, Dream texted:  
16 “This is Deff ignoring. U better not be cheating on me.” As soon as Ms. Mangroe  
17 saw her messages, she told Dream that her phone was on silent to try to placate his  
18 escalating anger.

19 151. When Dream returned from his trip, Ms. Mangroe tried to focus on  
20 recording and staying focused on her goals while keeping Dream as calm as possible.

21 152. On the rare occasions that Ms. Mangroe was allowed to go into the  
22 studio, Garland said that Dream told him to make sure she was “liquored up” before  
23 getting there.

24 153. If Dream was at the studio when Ms. Mangroe arrived, he would check  
25 to make sure she was intoxicated and if he did not think she was drunk enough, he  
26 would forcefully pull her hair back and force her to drink more alcohol.

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1           154. If Ms. Mangroe wore her hair in a ponytail, Dream would roughly yank  
2 her head back and pull out her hair tie.

3           155. Ms. Mangroe had become so isolated and dependent on Dream for food  
4 and shelter in such a short period of time that it became increasingly difficult for her  
5 to comprehend the reality of her situation.

6       **VII. Ms. Mangroe is Signed to Contra Paris and Epic Records**

7           156. In or around March 2015, Dream told Ms. Mangroe that Antonio “L.A.”  
8 Reid (“Reid”) reached out to him about signing her to Epic Records.

9           157. Dream said he would handle all the negotiations with Epic, refusing to  
10 include Ms. Mangroe and insisting that any questions she asked him to get a better  
11 understanding of the situation were disrespectful.

12           158. At or around the same time, Ms. Mangroe was staying at a new hotel  
13 that provided a driver who would take guests to destinations within a short distance.  
14 This was the first time Ms. Mangroe had any freedom to control when and where  
15 she could eat. She often asked the driver to take her to get food and got to know him  
16 a bit. After several weeks, the driver expressed concern for Ms. Mangroe because,  
17 as he said, she was always alone, she never left the hotel except to get food, and she  
18 did not appear well.

19           159. It was the first time that Ms. Mangroe had any real contact with anyone  
20 other than Dream and the people he surrounded himself with; she felt embarrassed  
21 and ashamed that the driver could tell something was wrong.

22           160. Ms. Mangroe knew that her physical and mental state was deteriorating  
23 and was trying to figure out a way to go back home until she had her recording  
24 contract in place that she believed could protect her from Dream’s control and abuse,  
25 especially given that most of her time was spent alone just waiting for Dream or  
26 someone from his team to tell her she needed to be in the studio.

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1           161. Dream, who was married, had a child on the way in May 2015 so he  
2 was more distracted than usual. Ms. Mangroe used that time to ask if she could leave  
3 for a few days to visit her mother. Dream told her that she could only go home if  
4 she left all her belongings with Garland.

5           162. Perhaps sensing Ms. Mangroe's newfound realization of the abusive  
6 situation she was in, Dream's sexual assaults intensified. On one occasion, Dream  
7 told Ms. Mangroe that he wanted to take her to a movie. When they arrived, there  
8 was another man in the theater who they did not know. Dream demanded that Ms.  
9 Mangroe perform oral sex on him while the man watched. She said no. Dream got  
10 angry and forced Ms. Mangroe to have sex with him in the theater while the man  
11 presumably watched. It was a physically painful encounter.

12           163. On the same evening, Dream took Ms. Mangroe to the parking lot of  
13 Triangle Sound Studio in his sprinter van, which had been remodeled as a tour van  
14 with a mattress in the back. Once they arrived at the gated lot, Dream told Ms.  
15 Mangroe that they were not actually going to the studio, but instead he asked her to  
16 leave and enter the van from a separate entrance, at a different time than he did—  
17 seemingly in an attempt to keep his plans a secret from others present at the studio.

18           164. Once in the van, Dream locked the doors and pushed Ms. Mangroe into  
19 the dark back area of the van. He pinned her on the mattress in the van, took off her  
20 clothes, and started forcibly having sex with her. He pressed his full body weight  
21 onto Ms. Mangroe while covering her mouth and nose with his hands so that she was  
22 unable to breathe. He told her that he was angry that she wanted to go home and  
23 screamed at her that she was difficult and ungrateful as he forced himself on her.

24           165. Dream then began to choke Ms. Mangroe, demanding that she tell her  
25 "are you mine?" and instructing her to "say you're mine." His aggression scared  
26 Ms. Mangroe, and the choking became so intense that she believes she might have

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1 lost consciousness at one point during the ordeal. He told Ms. Mangroe that she  
2 better remember who she belongs to while she was gone, demanded that she tell him  
3 that she loved him, and further told her that he knows everything about her, and is  
4 the foundation of her career and of her record project. Once he finished, he  
5 instructed Garland to come to the parking lot and take Ms. Mangroe back to her  
6 hotel. Ms. Mangroe had bruises across her neck from Dream's strangulation.

7 166. Ms. Mangroe left for Amsterdam with one small bag on or around April  
8 7, 2015. At that time, Dream instructed Ms. Mangroe that she could only be in  
9 Amsterdam for few weeks as the recording contract and distribution deal were  
10 finalized and executed.

11 167. In or around April 11, 2015, Ms. Mangroe texted Dream about a  
12 Billboard Magazine interview he did that had just been published. He previously  
13 told her that he was going to discuss her as one of his new artists in the interview.  
14 She never came up in the interview, so she texted Dream to ask why she was not  
15 mentioned. It was an innocent inquiry but caused Dream to fly into a rage. He sent  
16 several pages of text messages in response saying

17  
18 ...it wasn't about you it was about me, don't patronize me  
19 Channii u know I'm smarter than that and stop being so  
20 selfish...don't ever call me about something so minute  
21 again please...[you] treat me like I'm some side bitch or  
22 something or as if I'm not important just because I made  
23 u important...I'm giving up...I'll let everyone know  
24 where we stand.

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1 168. Ms. Mangroe, who was just excited about the possibility of being  
2 mentioned in the article, was completely taken aback by his reaction because he was  
3 becoming more and more unpredictable. She realized that anything she asked him  
4 had the potential to make him angry, and that she had no way of knowing what would  
5 and would not cause such an explosive reaction. She was very thankful to be having  
6 the conversation via text instead of in person.

7 169. Dream refused to speak to Ms. Mangroe for several days and she was  
8 left completely in the dark about whether he was planning to move forward with Ms.  
9 Mangroe's record.

10 170. Garland then texted Ms. Mangroe to say he had spoken to Dream. He  
11 told her that she needed to play her role, show she was humble, show her passion  
12 and loyalty, and provide a gift to Dream as a peace offering. Garland suggested  
13 customized Contra Paris clothing to prove to Dream that she was committed.

14 171. Dream eventually responded to Ms. Mangroe. She was forced to  
15 reiterate how grateful she was for him, tell him that he meant everything to her, and  
16 so forth. She continued texting Dream good morning to ensure that she was checking  
17 in as he ordered.

18 172. On or around April 16, 2015, Dream texted Ms. Mangroe to say that  
19 Reid and Epic Records were going to be their partner on her record deal. This  
20 essentially meant that once she signed a recording contract with Contra, she would  
21 sign a distribution contract with Epic. Once both of the contracts were signed, Ms.  
22 Mangroe's album could be finalized and released.

23 173. On April 21, 2015, while Ms. Mangroe was still in Amsterdam, she  
24 finally signed the Contra Contract. The Contra Contract was a "recording and  
25 shopping" contract that provided Contra with the exclusive rights to all audio and  
26



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1 audio visual recordings in addition to a six-month time period to enter into or  
 2 substantially negotiate a distribution agreement.

3 174. The Contra Contract specifically noted that Dream was an agent of  
 4 Contra, and upon information and belief, he was also the principal of the LLC.

5 175. On May 1, 2015, Ms. Mangroe then signed the Epic Records contract.  
 6 On the same day, Dream texted Ms. Mangroe: “It will always be mine, not just your  
 7 pussy. All of you. [U]re blood. [U]re mind. Your heart.”

8 176. Dream maintained complete control over communications concerning  
 9 Ms. Mangroe’s deal and Epic—he refused to connect her to anyone directly, or even  
 10 to include her in email or text chains with the executives from the major record label  
 11 she was now signed to.

12 **VIII. Ms. Mangroe Meets with Representatives from Epic and Dream**  
 13 **Becomes Jealous, Possessive, and Violent**

14 177. Ms. Mangroe had a return ticket booked to Atlanta for May 12, 2015.  
 15 She texted Dream to confirm that he wanted her to return on that date but given that  
 16 his son was born just a few days earlier, he told Ms. Mangroe that he would let her  
 17 know when to return to Atlanta.

18 178. Finally, in late May 2015, Ms. Mangroe was told that Reid and Joey  
 19 Arbagey (“Arbagey”), former Executive Vice President, A&R at Epic Records,  
 20 wanted to meet her in person. She returned to Atlanta on or around May 26, 2015  
 21 to prepare.

22 179. Dream told her to practice three specific records for the meeting:  
 23 Married to the Game, 187, and Road. However, when they got to the studio with  
 24 Reid, Dream began playing a fourth song, C.R.E.A.M.—one that Dream specifically  
 25 refused to send to her to allow her to practice—in an effort to embarrass and sabotage  
 26 her in front of Reid.

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1 180. After Ms. Mangroe performed, Dream turned his chair toward her and  
2 placed his hand on her bare inner thigh and stroked her leg in front of Reid and  
3 Arbagey while the group spoke about her performance. It was humiliating for Ms.  
4 Mangroe and served only to assert Dream's dominance over her.

5 181. During the group conversation, Reid said that he liked how "sexy" Ms.  
6 Mangroe was, which infuriated Dream.

7 182. After Reid and Arbagey left the studio, Dream mentioned Reid's  
8 comment and forcefully had sex with Ms. Mangroe in the vocal booth while Garland  
9 guarded the studio door. It was so rough and painful that Ms. Mangroe began to  
10 bleed vaginally. Ms. Mangroe did not want to have sex with Dream at the time, and  
11 certainly did not consent to the physical violence and force he used during the  
12 encounter.

13 183. During this trip to Atlanta, Ms. Mangroe celebrated her 24th birthday  
14 and she posted a selfie to her social media to celebrate the occasion. Dream  
15 immediately texted her to delete it. She quickly complied. Dream replied, "You  
16 can't keep doing and undoing, if you don't get it just say you don't and we can move  
17 on, I got my own shit to worry about." It was yet another not-so-subtle threat that if  
18 Ms. Mangroe did not do exactly as she was told, Dream could destroy her career.

19 184. Ms. Mangroe flew back to Amsterdam on or around May 29, 2015 to  
20 await further details about the next steps.

21 185. On or around May 19, 2015, Epic wired Ms. Mangroe's \$35,000  
22 advance. It was only then that Ms. Mangroe was provided with any compensation  
23 for the work she had been doing for Dream since January. Ms. Mangroe was told  
24 that Dream and Tricky both received \$150,000 upon the execution of the contract.

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1 186. Ms. Mangroe remained extremely confused about the next steps but  
2 became afraid to ask Dream any scheduling questions because he took that as a sign  
3 of disrespect.

4 187. She reached out to sound engineer, Schoudel, to ask if he knew anything  
5 about the schedule. She told Schoudel that Dream told her they were going to finish  
6 recording the album in Las Vegas, but that she was not given any time frame despite  
7 trying to figure it out.

8 188. Schoudel confirmed that Dream said the same thing to him and then  
9 said, "But not allowed to ask [about timing] right!? That's what he had said to me  
10 too. Vegas...wonder when...If I hear anything, I'll let you know." Ms. Mangroe  
11 responded, "Yes I will let you know too!! It's crazy right, I don't t know anything  
12 about my album, I was supposed to get a schedule. Nothing[.]"

13 189. Ms. Mangroe also started asking Dream more questions about  
14 Beyonce's tour because he continued to regularly tell her that she was "prepping"  
15 for it. Dream played Ms. Mangroe a song he wrote for Beyonce that featured Jay-  
16 Z. He told Ms. Mangroe that he was not allowed to play the song for anyone but he  
17 allowed her to hear it to get her excited for the tour.

18 190. Weeks later, Ms. Mangroe mentioned to Schoudel that Dream played  
19 her a new Beyonce song. She was excited about hearing it and asked Schoudel not  
20 to tell Dream she told him that she heard it. However, to her shock, Schoudel told  
21 Ms. Mangroe that it was an old record they had cut and that it ultimately did not  
22 make Beyonce's previous album. It was not part of a new album or tour. In fact, as  
23 it turned out, Beyonce was not preparing for a tour at all. Ms. Mangroe started to  
24 realize that the dizzying whirlwind Dream had led her through was a mirage, and  
25 she started to fear that Dream never truly wanted to produce her record, but just  
26 wanted to control her physically and mentally.

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1 191. In mid-June 2015, Ms. Mangroe asked Dream when she could come  
2 back to start working again. She said, “U do know u need to approve if I wanna go  
3 out there, ur the one that controls my budget. Also, I can be there this  
4 weekend...Soooo.....it’s up to you.”

5 192. After Dream responded that he thought Ms. Mangroe was flying herself  
6 to Atlanta, i.e., using her own money instead of the money in her Epic budget, Ms.  
7 Mangroe said she could do that, but she thought Dream wanted her to stay there,  
8 which she could not afford to do on her own. Dream then told her that he did not  
9 “want to burn out your budget, we are planning on finishing [the record] in Las  
10 Vegas.”

11 193. As a result, Ms. Mangroe was forced to continue waiting for Dream to  
12 provide permission to use her budget for her traveling and living expenses, or to go  
13 back into a studio to continue recording her music.

14 194. Throughout July, Ms. Mangroe continued to wait. She was fearful of  
15 asking too many questions because of the way Dream reacted. However, Dream  
16 also became angry and called her disinterested if she was not regularly keeping in  
17 touch. It was an impossible balance.

18 195. In mid-July, Dream reached out to Ms. Mangroe to say he was planning  
19 her first showcase for the label in August and was working on the radio edit for  
20 Married to the Game. Ms. Mangroe said she was looking forward to the details.  
21 Later the same day, Dream texted, “I need to fuck you now.”

22 196. The following day, when Ms. Mangroe did not immediately respond to  
23 a text message, Dream texted her “[U] better not be fuckin cheating!!! Where the  
24 fuck you at!”

25 197. In late July, Dream began pressuring Ms. Mangroe to hire Cynthia  
26 Campbell (“Campbell”), an assistant who Dream personally knew but who had little

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1 experience with musicians, and to pay her \$15,000 for the first three months. He  
2 also told Ms. Mangroe to move in with Campbell, presumably as a way to keep close  
3 track of Ms. Mangroe.

4 198. Dream also scolded Ms. Mangroe for failing to buy Garland a gift after  
5 her contracts were signed given that Garland was the person who connected her to  
6 Dream.

7 199. While appreciative of Epic's \$35,000 advance, Ms. Mangroe had been  
8 working and then sitting around without any compensation for many months. The  
9 advance was not enough money for Ms. Mangroe to hire her own assistant, pay for  
10 her living expenses, and pay Garland a finder's fee. Ms. Mangroe had no idea when  
11 or if another paycheck would come.

12 200. Garland then began pressuring Ms. Mangroe to give him \$10,000 to  
13 expand his security business. He said that Dream promised to pay him a finder's fee  
14 but had not paid it and that he was in a precarious financial position.

15 201. For the first time, Ms. Mangroe pushed back. She told Dream that with  
16 only \$35,000, she did not have enough money to pay Campbell, rent an apartment,  
17 and give Garland money and/or gifts.

18 202. Dream was angry and chastised Ms. Mangroe for being selfish,  
19 accusing her of not being serious about music because she could not pay for her own  
20 assistant and did not treat the people who helped her get to where she was correctly.

21 203. Ms. Mangroe attempted to explain, but there was no point. Dream  
22 simply continued berating her.

23 204. Soon thereafter, Dream coerced Ms. Mangroe to have sex in the  
24 bathroom. He purposely banged her face against the sink causing her right eye to  
25 swell and bruise. Several people in the studio asked what happened to her eye; Ms.  
26 Mangroe lied and said she ran into something.

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**IX. Ms. Mangroe Tries to Complete Her Album and is Subjected to  
Repeated Abuse by Dream**

205. By the end of July 2015, Ms. Mangroe was desperate to get back into the studio, finish her work, and move on to the next step in the process. She believed that being signed to Epic would provide the necessary buffer between her and Dream.

206. Ms. Mangroe should have been given some control over her recording budget, but Dream maintained full control over it via his role as Chairman of Contra.

207. Overseeing Ms. Mangroe's budget allowed Dream to book and arrange everything, so he maintained complete control over Ms. Mangroe.

208. As a result, when Ms. Mangroe returned to Atlanta to finish her record, she was living in mid-range hotels and AirBnBs while her recording engineers were placed in 4-star hotels. This was designed to punish and embarrass Ms. Mangroe because Dream was angry that she requested a new hotel during her last stay.

209. When Ms. Mangroe questioned why those supporting her album were placed in better hotels than she was, Dream made snide remarks about her only wishing she could stay in a 4-star hotel. He called her ungrateful.

210. Ms. Mangroe got back into the studio in early August 2015. Dream and Tricky began demanding that she pay for the food they ordered. Often times, Dream would not touch the food—it was just a test and a way for Dream to control the small amount of money she was given. Dream also made Ms. Mangroe order champagne and cupcakes for the studio personnel. He said that she needed to learn how to treat the people supporting her, which was ironic given the way he treated her.

211. Dream's abusive behavior continued to escalate. While recording in August 2015, another artist complimented Ms. Mangroe's shoes, which angered

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1 Dream. He locked Ms. Mangroe into a room off of the studio and sexually and  
2 physically assaulted her while Garland guarded the door.

3 212. On one occasion, Ms. Mangroe's A&R at Epic, Ericka Coulter  
4 ("Coulter"), joined Dream and Ms. Mangroe in the studio. During this session,  
5 Coulter personally witnessed Dream pulling Ms. Mangroe's hair tie out, pulling her  
6 hair back to open her mouth, and forcibly pouring vodka down her throat. Coulter  
7 also saw Dream touch Ms. Mangroe's body while in the studio. When Ms. Mangroe  
8 caught Coulter's eye, she motioned to her, asking if she saw what just happened and  
9 suggesting she was uncomfortable. Coulter brushed off Dream's violent actions.  
10 Coulter also saw explicit sexual text messages between Dream and Ms. Mangroe  
11 during this session, leaving no doubt that she knew what Dream's true intentions  
12 with Ms. Mangroe were.

13 213. Around the same time, Dream told Ms. Mangroe that he got his gun  
14 license back and could start carrying his own guns again. In a show of violent  
15 machismo, Dream, Garland, and others arranged for Dream's multiple firearms to  
16 be returned to him in the parking lot of Tricky's studio by means of parking two cars  
17 next to each other and ostentatiously moving guns from one car to the other. Ms.  
18 Mangroe witnessed this entire charade and was terrified of Dream's comfort with  
19 guns.

20 214. After this, Dream regularly kept a gun on him. When he forced Ms.  
21 Mangroe to have sex, he would often place the gun next to her as a warning.

22 215. Ms. Mangroe was becoming increasingly isolated from her family. She  
23 spent so much of her time worrying about keeping Dream happy that she had little  
24 time to focus on anything else.



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1           216. Dream began getting pushy about meeting Ms. Mangroe's mother. She  
2           tried to put it off because she was afraid that Dream would hurt her mother or that  
3           her mother would see Dream's abuse.

4           217. Eventually, Ms. Mangroe's mother arrived in Atlanta while Ms.  
5           Mangroe was recording at the studio. Ms. Mangroe's mother went to the studio to  
6           pick up Ms. Mangroe and met the sound engineer, Nate Alford ("Alford").

7           218. When Alford told Dream that he met Ms. Mangroe's mother, Dream  
8           was furious because Alford met her before he did.

9           219. Dream was livid and pulled Ms. Mangroe to the staircase of the studio.  
10          While in the staircase, Dream forcefully pulled Ms. Mangroe's dress up, forced her  
11          down on the stairs, and proceeded to forcibly rape her from behind while he held her  
12          arms with one hand and holding the collar of her dress with the other. Ms. Mangroe  
13          was unable to move, with Dream completely controlling her body. He pulled the  
14          dress collar tightly around her neck, and Ms. Mangroe gasped for air and begged  
15          him to stop choking her. He pulled on the collar even harder, causing Ms. Mangroe's  
16          voice to distort, and eventually she was gasping for breath. He continued to pull so  
17          intensely at the collar around her neck that Ms. Mangroe heard the seams of her dress  
18          rip. While he raped her, Dream scolded her, saying that she was difficult, that she  
19          did not respect him enough, and that he did everything for her. During this ordeal,  
20          Ms. Mangroe thought she would not survive the attack.

21          220. Ms. Mangroe's mother did not witness the rape or the strangling, but  
22          she was concerned about her daughter. She said she felt like she was losing her and  
23          was concerned about Dream.

24          221. Ms. Mangroe tried to assuage her mother's worry. She admitted that  
25          Dream had been sexually and physically aggressive but lied to her mother by  
26          insisting that it had gotten better.

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1           222. Dream’s abuse was escalating to the point that it was becoming  
2 increasingly difficult to hide it from people as he was regularly flying into a rage  
3 over everything. Dream seemed obsessed over Ms. Mangroe’s alleged lack of  
4 gratitude and the fact that she refused to use her small advance to buy him, Garland,  
5 and others gifts and/or hire his friend. The fact that Ms. Mangroe said no to him was  
6 simply something that Dream could not get over.

7           223. In early August 2015, Dream told Ms. Mangroe that he found her a  
8 manager named Gee Roberson (“Roberson”) who was a good friend of his who  
9 managed Drake and Nicki Minaj. Ms. Mangroe was thrilled because she desperately  
10 wanted to find a way to put distance between her and Dream while fulfilling her  
11 contractual obligations to Contra. She thought that perhaps her new management  
12 could protect her. However, things continued to escalate.

13           224. On or around August 15, 2015, Dream told Ms. Mangroe to meet him  
14 at the studio. Ms. Mangroe went to Silent Studios but Dream did not show up. The  
15 following day, Dream texted Ms. Mangroe, “...I don’t feel like we have the same  
16 interest for each other and I dropped something yesterday and waited on you and  
17 didn’t hear a word...We had a good ride but truthfully I can’t do it for you and it’s  
18 lopsided.”

19           225. Ms. Mangroe responded that she was there, and he never showed up.  
20 Dream said he was at Red Zone Studio and that she should have known to ask which  
21 studio and not assumed it was Silent Studios. He then said, “Please end text after  
22 this and have whoever else contact me from now on thank you and good night, and  
23 your [sic] welcome.” He then continued, “Don’t contact me about anything about  
24 this album and if you wanna have a respectful conversation with me I’ll you know  
25 when I get the time, but not right now.”

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1           226. Later that evening, Tricky texted Ms. Mangroe that she could come  
2 hang at the studio. Ms. Mangroe reported to Tricky, who was a partner at Contra,  
3 what Dream had been doing to her. Specifically, she stated that “I haven’t told u a  
4 lot but I can’t take it anymore and I don’t want [the] music to suffer because we do  
5 great things but I can’t be on [t]his roller coaster ride of threats of ending the project  
6 [if] I don’t please [D]ream or if I misunderstand something, so many times has he  
7 yelled at me for the littlest things! You are a part of [C]ontra Paris too and I can’t  
8 take it anymore!!” Tricky simply responded, “Oh. I’ll speak to him.”

9           227. Soon thereafter, Ms. Mangroe left the AirBnB where Dream had put her  
10 up and booked a hotel room near the airport. She was terrified, but realized she  
11 needed to escape the months of fraud and violence she had endured at Dream’s  
12 hands.

13           228. Ms. Mangroe confided in Coulter, sharing with her by phone on August  
14 17, 2015 that Dream was sexually and emotionally abusive, had been violent with  
15 her, and was preventing her from finishing her record. At first, Coulter said that “as  
16 a woman,” she understood and would take care of Ms. Mangroe. Within the hour,  
17 however, Coulter had spoken to Dream, and told Ms. Mangroe that she needed to  
18 figure out a way to work with Dream again, despite being told of the pattern of abuse  
19 Ms. Mangroe had endured.

20           229. Ms. Mangroe then confided in Mark Stewart (“Mark”), Dream’s  
21 manager, that Dream was sexually and physically abusive and that it had gotten  
22 increasingly worse, and she needed help to get away from him.

23           230. Mark seemed genuinely concerned about Ms. Mangroe’s safety, but  
24 told Ms. Mangroe that it seemed like a personal problem that he did not want to be  
25 involved in. But of course, far from being exclusively a “personal” issue, Dream’s  
26

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1 abuse of Ms. Mangroe was part and parcel of his professional persona and his  
2 business of producing and writing music.

3 231. Ms. Mangroe reiterated to Mark that it was a dangerous situation and  
4 that she did not feel safe staying in the hotel because Dream and Garland had such  
5 easy access to her. She also told Mark that for her own safety, she would no longer  
6 be alone in a room with Dream or Garland.

7 232. On or about August 19, 2015, Mark finally agreed that he would figure  
8 out a solution. The following day, he agreed to arrange a one-way plane ticket to  
9 Los Angeles under the excuse that Ms. Mangroe was meeting with Coulter. The  
10 ticket was paid for by Epic.

11 233. When Ms. Mangroe arrived in Los Angeles, she called Roberson to  
12 explain the abusive nature of her relationship with Dream. Roberson brought Jean  
13 Nelson and J. Erving (“Erving”) to the meeting. During the meeting, Roberson said  
14 that he would handle Dream and Erving would serve as Ms. Mangroe’s day-to-day  
15 manager.

16 234. On August 21, 2015, Ms. Mangroe then met with Coulter and again  
17 reiterated that Dream was abusive and controlling. Ms. Mangroe made clear that  
18 regardless of Dream, she was committed to completing the record and moving  
19 forward with her contract but that she needed to be protected from him.

20 235. Coulter informed Ms. Mangroe that Dream was withholding the music  
21 she recorded with him from Epic Records. Pursuant to the contracts she signed, Ms.  
22 Mangroe was obligated to turn over music to Epic within a specific timeframe.

23 236. Ms. Mangroe asked her new management and others at Epic for help  
24 intervening in this situation, retrieving her music, and extricating her record from  
25 Dream’s grasp. For many months, Dream refused to meet with her, and even when  
26 he met with her management, he refused to turn over Ms. Mangroe’s music. Having

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1 had her trust completely betrayed by Dream, she was very concerned that her  
2 management no longer had her best interests in mind.

3 237. Indeed, in early November 2015, Ms. Mangroe was finally scheduled  
4 to meet with representatives at Epic, including Reid, in New York to discuss the  
5 future of her album. Tricky; Sylvia Rhone, the then-President of Epic Records;  
6 Arbagey; and a full marketing team were also present.

7 238. Shortly before the meeting with Reid began, Dream texted Ms.  
8 Mangroe: "Oh so you tried to play me. Ok...I leave u with this. That record is a  
9 mistake if u put it out. Don't ever say I didn't look out."

10 239. Ms. Mangroe had no idea what Dream meant but knew he did it to rattle  
11 her before her meeting with Reid. She did her best to ignore it and hold it together  
12 during the meeting.

13 240. It was a pivotal moment in Ms. Mangroe's career. Much to her surprise,  
14 however, Erving was a no-show. Instead, he sent a young intern in his place. It was  
15 evident during the meeting that Reid found it offensive that Erving did not bother to  
16 show up for the meeting. Reid asked Ms. Mangroe where he was; she had no answer.

17 241. Ms. Mangroe did her best to keep the meeting on track and reiterate  
18 how much she wanted to move forward and make the best record possible for Epic.  
19 She told Reid that she had worked for ten years to get to where she was but that she  
20 was not getting any of her music from Dream and his team and did not know what  
21 to do. She confirmed that she wanted to move forward but there was a problem  
22 standing in the way. Rhone and Reid both responded "Dream" at the same time.  
23 Reid then asked Tricky to speak to Dream about the situation.

24 242. Surprisingly, Tricky also voiced concerns during the meeting that  
25 Dream was asking Ms. Mangroe to sing songs that were not culturally appropriate  
26 based on her background. In particular, he mentioned that one of the songs

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1 references Ms. Mangroe and “rastas.” Tricky told Reid that Ms. Mangroe had no  
2 say in what she was singing and that if she was found to be engaging in cultural  
3 appropriation, it would be an issue.

4 243. Ms. Mangroe left the meeting believing that Reid and his team  
5 understood the situation with Dream and would help. At the time, Reid appeared to  
6 agree that they should move forward with other producers.

7 244. Reid also gave Ms. Mangroe his direct phone number and told her to  
8 call if she needed anything.

9 245. However, in early December 2015, Erving suddenly told Ms. Mangroe  
10 that Reid wanted Dream to be involved in the record again.

11 246. Ms. Mangroe was terrified at the prospect of having to record with  
12 Dream again, but told Erving that she was professional enough to do it if required;  
13 she asked Erving if he could at least to try to arrange work with other producers first  
14 with the hope that she would not be forced to work with Dream.

15 247. Erving replied that they were ready to work with other producers but  
16 that they needed to be careful about the situation with Dream because of the contracts  
17 Ms. Mangroe signed.

18 248. It was, quite plainly, a no-win situation for Ms. Mangroe. While she  
19 remained under contract with Dream via Contra, he refused to send any music or  
20 schedule studio time.

21 249. Ms. Mangroe spent the first few months of 2016 trying to figure out the  
22 next steps. She texted Coulter in late January and said, “I’m a little lost as to why  
23 I’m still not in the studio yet, it’s been forever and I wanna move forward! Do u  
24 know what it is? Is it because me and dream had a dispute or is it something else?  
25 Last sesh was in Atlanta in August! Trying to get some clarity from all sides.”  
26

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1           250. In February 2016, Ms. Mangroe was told that Epic finally approved a  
2 budget for her to shoot a video for Married to the Game. Ms. Mangroe was never  
3 informed what the budget was or how it was approved, and when she pressed for  
4 that information, she was stonewalled.

5           251. Ms. Mangroe told Erving to ensure that Dream and his team were  
6 copied on all communications related to the video shoot because she wanted to  
7 guarantee that she was abiding by her contractual obligations.

8           252. Erving, however, said that Dream refused to collaborate or respond,  
9 which delayed the process. Eventually, Erving said they could not continue waiting  
10 for Dream to respond and had to move forward. As Erving said to Ms. Mangroe,  
11 “[Dream] is already withholding music; we gotta move now.”

12           253. Finally, in March 2016, the video shoot for Married to the Game was  
13 scheduled.

14           254. Ms. Mangroe immediately went to work figuring out the vision and  
15 look for the video. She asked her management to always keep Dream in the loop,  
16 particularly because she still had no control or say over the budget. Ms. Mangroe’s  
17 management sent Dream the treatment for the video – he never responded or  
18 provided any input.

19           255. On the day of the shoot, Erving once again did not show up. Ms.  
20 Mangroe was given a bag of generic clothes that did not fit the style of the shoot,  
21 and all of the vision boards she created were ignored.

22           256. The video was incredibly important to Ms. Mangroe’s career. It was  
23 her moment to show Reid and Epic Records how she could be marketed to the world  
24 and to convince Epic to increase the recording budget so she could get back into the  
25 studio.



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1           257. Dream called her to say he heard the video was terrible and said, “this  
2 is what you get when you don’t listen to me...you got played.”

3           258. In April 2016, Ms. Mangroe flew to Los Angeles using her own money  
4 to do reshoots of the video because she cared so deeply about getting it right.

5           259. A few weeks later, Erving confirmed to Ms. Mangroe that he sent the  
6 revised video to Reid and the Epic Records team.

7           260. In May 2016, Erving told Ms. Mangroe that Reid loved the video. Ms.  
8 Mangroe was thrilled and said she was anxious to move things along.

9           261. Also in early May 2016, Ms. Mangroe’s product manager at Epic  
10 Records, Franz De Los Reyes, texted her to say that the video was “dope” and that  
11 they were planning the premiere.

12           262. However, Coulter suddenly told Ms. Mangroe that Dream complained  
13 about the video, that nobody at Epic Records liked the video, and that she should  
14 have worked with Dream on the video. Ms. Mangroe was shocked and confused—  
15 she had little insight into why she was getting such mixed messages from those  
16 working with her at Epic, and had the sense that Dream was continuing to put up  
17 obstacles in her career.

18           263. Ms. Mangroe pleaded with Coulter to see what Dream was doing – he  
19 was playing games and creating roadblock after roadblock. Ms. Mangroe said,  
20 again, that her team spent six weeks reaching out to Dream about the video, sent him  
21 the treatment to the video, and he refused to respond. Now that it was complete,  
22 Dream was complaining simply to derail her career again.

23           264. Coulter, who knew about Dream’s abuse, refused to provide any help  
24 or solution to Ms. Mangroe. Instead, she simply said that Ms. Mangroe needed to  
25 “get on the same page as Dream” for things to proceed. She also left unanswered  
26

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1 Ms. Mangroe’s repeated questions about who was in possession of her music—even  
2 though as her label, Epic should have been able to provide this information to her.

3 265. Ms. Mangroe did not know where to turn. Erving, her manager, told  
4 her that Reid loved the video; Coulter, who worked at Epic, told her that nobody at  
5 Epic liked the video; and Dream seemed to be taking great joy at the confusion and  
6 chaos it was causing.

7 266. Ms. Mangroe pleaded with Coulter to arrange a meeting with Reid to  
8 explain what happened and figure out how everyone could move forward. Reid,  
9 who had changed his phone number, was no longer directly reachable.

10 267. On June 25, 2016, Ms. Mangroe attended Epic Fest, a music festival  
11 showcasing artists signed to the Epic Records label. She hoped that would provide  
12 the opportunity to get in front of Reid for a discussion about next steps.

13 268. Ms. Mangroe was scheduled to go to the festival with Erving, but just  
14 thirty minutes before they were supposed to leave, Erving said he was still in Las  
15 Vegas and would meet her there. Ms. Mangroe was shocked but determined to go.

16 269. While she was at Epic Fest, Dream called Ms. Mangroe and told her  
17 that Epic was “washing their hands” of her. Ms. Mangroe did not know what he was  
18 talking about and thought that he was simply trying to harass her.

19 270. Ms. Mangroe then ran into Reid, Arbagey, and Coulter. Ms. Mangroe  
20 asked Reid if they could talk. Reid responded by saying, “hey baby, maybe later, we  
21 gotta go,” and grabbed Arbagey and ran off. Coulter then looked at Ms. Mangroe  
22 with a smirk and said “talk to your manager, why are you here? You’re dropped.  
23 [Erving] should have talked to you already.”

24 271. Erving, despite stating that he would meet Ms. Mangroe at Epic Fest,  
25 never appeared.

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1       272. Ms. Mangroe was caught off guard and felt humiliated because she was  
2 slowly realizing that perhaps everyone knew something that she was never told.

3       273. Ms. Mangroe then spoke to Rhone and asked if she knew what Coulter  
4 meant. Rhone said that she had no idea and offered to look into it.

5       274. Ms. Mangroe reached out to Erving as soon as possible. He admitted  
6 to her that he heard through the grapevine that she may be dropped by Epic; however,  
7 given that there was no official notification or anything more than a rumor, he did  
8 not want to bother Ms. Mangroe with the rumor.

9       275. On July 15, 2016, Ms. Mangroe got the official word that Epic no longer  
10 wanted to distribute her music because Dream failed to deliver the records. Arbagey  
11 told Ms. Mangroe that she was “dropped” because Contra failed to deliver the  
12 records and Dream was difficult to work with. Yet, nobody at any point sat down  
13 with Ms. Mangroe to discuss the situation with her. She was left in the dark  
14 throughout the entire process despite both Contra and Epic having a signed contract  
15 and owing corporate responsibilities to her, and despite agents of both entities  
16 knowing that Ms. Mangroe had been the subject of Dream’s violent and coercive  
17 manipulation, which they knew or should have known were predicated of fraudulent  
18 promises of record contracts, Grammys, and opening for Beyonce.

19       276. To this day, Ms. Mangroe is in the dark about whether or not she is still  
20 bound to Dream and Contra Paris, who owns her music rights, or where the  
21 recordings of her work are located.

22       277. Dream got what he wanted—he caused so much chaos and confusion  
23 with Epic that they simply no longer wanted to deal with Ms. Mangroe, who he had  
24 successfully duped into a fraudulent and coercive sexual relationship.

25       278. It was a devastating blow to a young, talented artist who had done  
26 everything possible to survive the situation with Dream and move forward. Yet, it

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1 became abundantly clear that Dream was only interested in an artist who was fully  
2 compliant with all of his demands. When Ms. Mangroe finally found the courage to  
3 stand up to him – ever so slightly – he no longer found her to be worthy of his time  
4 and set out to ensure that nobody else would work with her either.

5 279. Within a few weeks of Epic notifying her team that they did not want  
6 to proceed, Ms. Mangroe’s management team dropped her as well.

7 280. Not only did Dream ruin Ms. Mangroe’s chance with Epic Records, he  
8 also ensured that she could not work for the next decade by refusing to officially  
9 release her from her contract. As a result, if she recorded music she would be in  
10 breach of her Contra agreement. She begged to be released from Contra, but they  
11 continued to ignore her requests.

12 281. Ms. Mangroe lost everything – her ability to work as an artist, her  
13 ability to work in the United States, and her ability to live a life free from the trauma  
14 Dream inflicted.

15 **X. Ms. Mangroe’s Suffering Following Dream’s Abuse and Manipulation**

16 282. Ms. Mangroe has not been the same since Dream’s abuse and her  
17 experience with Contra and Epic, and she believes that the experience broke her as  
18 an artist and as a woman.

19 283. When she finally understood the devastation Dream’s actions caused,  
20 she lost her passion for music and life in general. She spent several years rarely  
21 leaving her house.

22 284. When Ms. Mangroe would try to sing, she would have flashbacks and  
23 panic would set in, and she just could no longer do what her entire life purpose had  
24 been previously.

25 285. Dream’s sexual assaults, physical violence, and manipulation weighed  
26 on Ms. Mangroe for almost a decade.

1           286. In late December 2016, Ms. Mangroe's general practitioner referred her  
2 for treatment of anxiety and depression because she was suffering from panic  
3 attacks, insomnia, and lethargy. She could not speak about the sexual abuse Dream  
4 inflicted until 2018, and then worked in therapy to attempt to get her life back.

5           287. However, Ms. Mangroe's life will never be the same. She lost a decade  
6 of her life due to Dream's abuse and the willingness of Contra, Epic, and Reid to  
7 look the other way. She remains unable to engage in her work as a recording artist  
8 due to the pain and devastation she endured.

9  
10                               **FIRST CAUSE OF ACTION**  
11                               **Sex Trafficking under 18 U.S.C. § 1595**  
12                               ***Against All Defendants***

13           288. Plaintiff repeats and realleges each and every allegation in all of the  
14 preceding paragraphs as if fully set forth herein.

15           289. Plaintiff is a victim of sex trafficking within the meaning of 18 U.S.C.  
16 § 1591(a) and (b) and is therefore entitled to bring a civil action under 18 U.S.C. §  
17 1595.

18           290. The Defendants' acts and omissions, taken separately and/or together,  
19 as outlined above, constitute a violation of 18 U.S.C. § 1595. Specifically,  
20 Defendant Dream and Contra Paris perpetrated sex trafficking of Ms. Mangroe by  
21 requiring her to engage in forced sexual acts in multiple jurisdictions, and all  
22 Defendants benefitted from Dream's venture by holding Ms. Mangroe, an artist  
23 signed with Defendants Contra Paris and Epic Records, captive to Dream's demands  
24 and desires. At all relevant times, Defendants participated in and facilitated the  
25 harboring and transportation of Plaintiff for purposes of sex induced by force, fraud,  
26 or coercion.

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291. The Defendant Corporations have financially and otherwise benefited as a result of these acts and omissions by keeping Dream, the volatile and explosive owner of the Defendant Contra Paris, and an influential and prolific songwriter for today's biggest stars, satisfied. They benefited from facilitating his behavior to the extent it kept their relationship with the talented musician viable and ensured continued profit from his work.

292. Dream, and Defendants Contra Paris and Epic Records, formed a venture as defined by 18 U.S.C. § 1595 given that they constituted a "group of two or more individuals associated in fact, whether or not a legal entity."

293. As a direct and proximate result of Defendants' unlawful conduct as alleged hereinabove, Plaintiff has suffered physical injury, severe emotional distress and anxiety, humiliation, embarrassment, post-traumatic stress disorder, economic harm, and other consequential damages.

294. Plaintiff also seeks reasonable attorneys' fees as provided under 18 U.S.C. § 1595(a).

**SECOND CAUSE OF ACTION**  
**(Sexual Battery)**  
***Against Defendant The-Dream***

295. Plaintiff repeats and realleges each and every allegation in all of the preceding paragraphs as if fully set forth herein.

296. Defendant Dream committed a battery against Plaintiff when he engaged in unlawful, intentional, and offensive touching or application of force to Plaintiff's person when he forced her to engage in unprotected sex by restraining her movement after she said no. Plaintiff did not act freely and voluntarily, and the actions were against Plaintiff's will, as defined in Cal. Penal Code § 243.4.

297. As a result of Dream's alleged conduct, Plaintiff has suffered severe emotional distress, humiliation, embarrassment, anxiety, economic harm, and other consequential damages.

298. The conduct of Dream described above was willful, wanton, and malicious. At all relevant times, Dream acted with conscious disregard of Plaintiff's rights and feelings, acted with knowledge of or with reckless disregard for the fact that his conduct was certain to cause injury and/or humiliation to Plaintiff, and intended to cause fear, physical injury, and/or pain and suffering to Plaintiff. By virtue of the foregoing, Plaintiff is entitled to recover punitive and exemplary damages from Dream according to proof at trial.

299. This cause of action is timely under California’s Sexual Abuse and Cover-Up Accountability Act, AB 2777 because it is “based on conduct that occurred on or after January 1, 2009, and is commenced [ ]after January 1, 2019,” and is thereby revised by Cal. Code Civ. Proc. § 340.16(b)(3).

### THIRD CAUSE OF ACTION

**(Rape)**

### *Against Defendant The-Dream*

300. Plaintiff repeats and realleges each and every allegation in all of the preceding paragraphs as if fully set forth herein.

301. Defendant Dream committed a rape against Plaintiff, as defined in Cal. Penal Code § 261(4)(D), as Plaintiff was incapable of resisting because she was not aware, knowing, perceiving, or cognizant of the essential characteristics of the act due to Defendant Dream's fraudulent representation that the sexual penetration served a professional purpose when it served no professional purpose.



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302. As a result of Dream's alleged conduct, Plaintiff has suffered severe emotional distress, humiliation, embarrassment, anxiety, economic harm, and other consequential damages.

303. The conduct of Dream described above was willful, wanton, and malicious. At all relevant times, Dream acted with conscious disregard of Plaintiff's rights and feelings, acted with knowledge of or with reckless disregard for the fact that his conduct was certain to cause injury and/or humiliation to Plaintiff, and intended to cause fear, physical injury, and/or pain and suffering to Plaintiff. By virtue of the foregoing, Plaintiff is entitled to recover punitive and exemplary damages from Dream according to proof at trial.

304. This cause of action is timely under California's Sexual Abuse and Cover-Up Accountability Act, AB 2777 because it is "based on conduct that occurred on or after January 1, 2009, and is commenced []after January 1, 2019," and is thereby revised by Cal. Code Civ. Proc. § 340.16(b)(3).

### **PRAYER FOR RELIEF**

**WHEREFORE**, Plaintiff prays judgment be entered in her favor against Defendants, and each of them, as follows:

A. For a money judgment representing compensatory damages including consequential damages, lost wages, earning, and all other sums of money, together with interest on these amounts, according to proof;

B. For a money judgment for mental pain and anguish and severe emotional distress, according to proof;

C. For punitive and exemplary damages according to proof;

D. For attorneys' fees and costs;

E. For prejudgment and post-judgment interest; and

1 F. For such other and further relief as the Court may deem just and  
2 proper.

3 **JURY DEMAND**

4 Plaintiff hereby demands a trial by jury on all issues of fact and damages stated  
5 herein.

6  
7 Dated: June 4, 2024

8 Respectfully submitted,

9 **WIGDOR LLP**

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(All to be admitted *pro hac vice*)

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